

# WYPDES CBM Modifications



Department of Environmental Quality



**AHAJOKES.COM**



# Types of Modifications

Notification

Minor

Major

Renewal

**Modification  
Guidance  
Document  
(website)**

## WYPDES Coalbed Methane Permits

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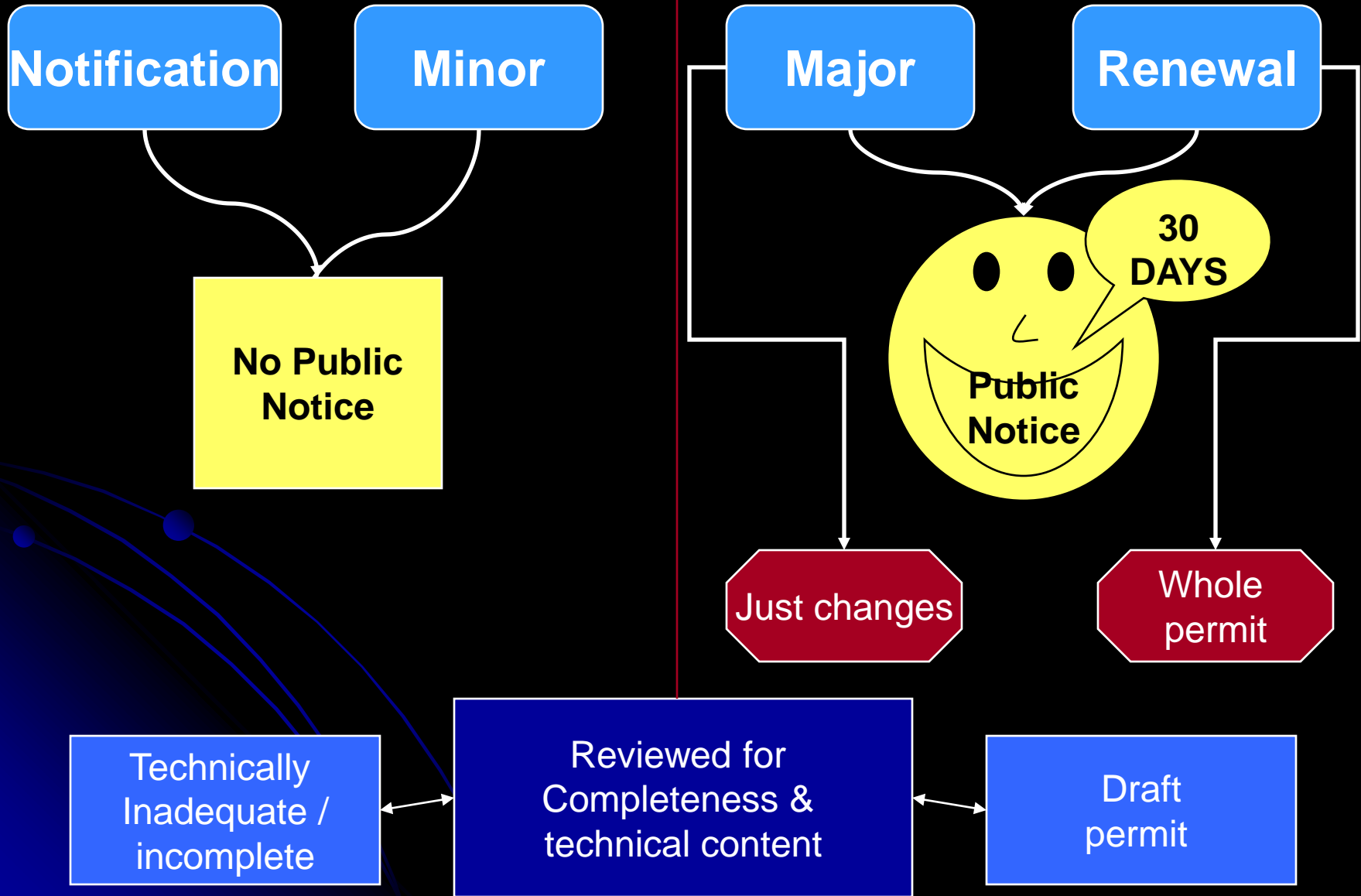
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<u>Application Form</u>	<u>Use for...</u>
CBM General Permit for Temporary Discharge/Notice of Intent ( <a href="#">pdf</a> )	temporary discharge of CBM water for purposes of groundwater characterization or emergency stock watering
WYPDES Application for Permit to Surface Discharge Produced Water from CBM New Discharges, Renewals, or Major Modifications (please note that an updated version of this form was posted on 3/24/07. Please begin using this form immediately. The WDEQ will require that all applications received after May 31, 2007 be submitted using this updated form) ( <a href="#">pdf</a> ) ( <a href="#">Word</a> )	New CBM facilities, permits up for renewal, or permits requesting a major modification*
WYPDES Application for Permit to Surface Discharge Produced Water from CBM Minor Modifications (revised 7-10-06) ( <a href="#">pdf</a> ) ( <a href="#">Word</a> )	Existing facilities requesting a minor modification*
<u>Supporting Documents</u>	<u>Description</u>
*Modification Guidance Document (revised 7-10-06) ( <a href="#">pdf</a> )	describes how to determine if a modification qualifies as a renewal, major modification, minor modification, or a notification letter
Permit Completeness Review Form ( <a href="#">pdf</a> ) (revised 6-23-06)	this is the form used by WYPDES CBM permit writers to determine if an application is complete or incomplete

# General Rule of Thumb

- If a modification is making a permit LESS stringent, it must go back through public notice (major mod, renewal)
  - Relaxed effluent limits (for example, dissolved iron to 1000 ug/l)
  - Less frequent monitoring
- If a modification is making a permit MORE stringent or equally stringent, does not have to go back through public notice
  - Removing an outfall

# Types of Modifications



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## Notification

Cover letter + information

- 1. New wells**  
(Same coal seam & flow rate)
- 2. Removal or transferring wells**
- 3. Relocating WQ stations**
- 4. Moving an outfall**  
( $<1510'$  once or within  $2640'$ )

Information filed in permit

## Minor

Application from website

- 1. New coal seam(s)**  
(Same or better water quality)
- 2. Remove or transferring outfall(s)**
- 3. Moving irrigation point**
- 5. Correct typo**
- 6. All wells to all outfalls**

Signed by permit writer &  
Mailed to permittee & filed

# Types of Modifications

## Major

Application from website

1. **Moving outfall** (>1510' or 2640')
2. **Adding an outfall**
3. **Change effluent limits or monitoring requirements less stringent**
4. **New coal seam**  
(degrades water quality)
5. **Other** (irrigation found, consolidate)

PN

Signed by admin & director

**High  
Priority**

## Renewal

Application from website

1. **Permit expiring**
2. **Increase flow rate**
3. **Other** (consolidate)

**Submitted 180 days**

PN

Signed by admin & director

# Current Common Modification Requests

- Assimilative capacity
  - Adding language that allows reservoir releases if authorized under Powder River Assimilative Capacity Policy
    - MAJOR MOD (less stringent)
  - Removing final reservoir containments to keep direct discharging once have credits in place (interim/final limits)
    - MAJOR MOD (less stringent)
- Cascading reservoirs
  - Modify language to allow uppermost reservoirs to discharge to lowermost reservoirs
    - MINOR MOD (equally stringent)
- Irrigation
  - Request more relaxed EC and SAR limits based on recently completed Section 20 study
    - MAJOR MOD (less stringent)

# Strategies for a modification

- Plan ahead
  - What will be done at the facility for the next three years? Expansion with new outfalls?
  - Permit consolidation
  - Watershed
- Public notice occurs around the 15<sup>th</sup> of each month.



# Helpful Tips

- Review application before submitting.
- Make sure all outfalls in one permit are in the same watershed (based on watershed permitting).
- Limit supplemental information.
- Application requesting just updates without any compliance issues will be returned.
- Be positive which type of application submitting.
  - Minor versus major versus renewals.
- Adding wells make sure there is a water balance.
- If permit expires > 3 months, effective date will be immediately.



Questions?

